

Virginia M. Barrett, Esq. (VMB3809)  
BARRETT LAZAR, LLC  
145 West Passaic Street  
Maywood, New Jersey 07607  
Tel.: 201-843-5900  
Attorneys for Defendants,  
SLAYMAKER LOGISTICS, LLC and  
ANDREW L. MILLER

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

-----X  
WILLIAM CORADO-LEMUS,

Civil Action No.

Plaintiffs,

vs.

SLAYMAKER LOGISTICS, LLC, ANDREW  
L. MILLER, JOHN DOE I-X (said names being  
fictitious, true names presently unknown), ABC  
CORP. I-X (said names being fictitious, true names  
presently unknown), DEF BROKERAGE CORP.  
I-X (said names being fictitious, true names  
presently unknown),

**NOTICE OF FILING OF NOTICE  
OF REMOVAL**

Defendants.

-----X

TO: Jack V. Corradino  
Corradino & Papa, LLC  
Casey Building  
935 Allwood Road  
Clifton, New Jersey 07012  
**Attorney for Plaintiff**

S I R S:

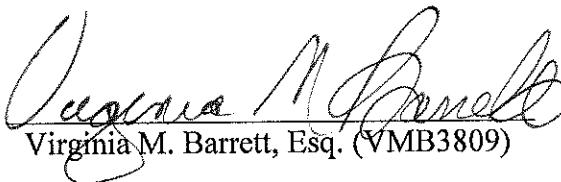
PLEASE TAKE NOTICE, that defendants, SLAYMAKER LOGISTICS, LLC and  
ANDREW L. MILLER, in the above-entitled action, have on this 9<sup>th</sup> day of April, 2019,  
removed this action to the Newark Vicinage of the United States District Court for the District of  
New Jersey, by filing a Notice of Removal, a copy of which is annexed hereto, in the Office of

the Clerk of the United States District Court for the District of New Jersey, 50 Walnut Street, Newark, New Jersey 07102, and in the Office of the Clerk of the Superior Court of New Jersey, County of Hudson, at 595 Newark Avenue, Jersey City, New Jersey.

BARRETT LAZAR, LLC  
Attorneys for Defendants,  
SLAYMAKER LOGISTICS, LLC and  
ANDREW L. MILLER

Dated: April 9, 2019

By:

  
Virginia M. Barrett, Esq. (VMB3809)

Virginia M. Barrett, Esq. (029161980)  
BARRETT LAZAR, LLC  
145 West Passaic Street  
Maywood, New Jersey 07607  
Tel.: 201-843-5900  
Attorneys for Defendants,  
SLAYMAKER LOGISTICS, LLC and  
ANDREW L. MILLER

-----X  
WILLIAM CORADO-LEMUS,

Plaintiffs,

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION : HUDSON COUNTY  
DOCKET NUMBER: HUD-L-1024-19

vs.

SLAYMAKER LOGISTICS, LLC, ANDREW  
L. MILLER, JOHN DOE I-X (said names being  
fictitious, true names presently unknown), ABC  
CORP. I-X (said names being fictitious, true names  
presently unknown), DEF BROKERAGE CORP.  
I-X (said names being fictitious, true names  
presently unknown),

**NOTICE OF REMOVAL**

Defendants.

-----X

Pursuant to 28 U.S.C. Sections 1441 and 1446, defendants, SLAYMAKER LOGISTICS, LLC and ANDREW L. MILLER, hereby remove this action from the Superior Court of the State of New Jersey, County of Hudson, Docket No. HUD-1024-19, to the Newark Vicinage - United States District Court for the District of New Jersey.

1. This Court has original jurisdiction over this action, pursuant to 28 U.S.C. Section 1332, on the ground that there is diversity of citizenship between the parties and the amount in controversy exceeds the sum of \$75,000.00, exclusive of interest and costs.

2. Plaintiff, WILLIAM CORADO-LEMUS, resides at 622 Warren Street, Apt. #4, Township of Harrison, County of Hudson and State of New Jersey.

3. Plaintiff commenced this action by filing a Complaint, dated March 5, 2019, in the Superior Court of the State of New Jersey, County of Hudson, against defendants, SLAYMAKER LOGISTICS, LLC and ANDREW L. MILLER. A Summons and Complaint were served on defendants, SLAYMAKER LOGISTICS, LLC and ANDREW L. MILLER, on or about March 27, 2019. (See copy of the Summons and Complaint, annexed hereto as **Exhibit “A.”**)

4. Defendant, SLAYMAKER LOGISTICS, LLC is a Limited Liability Corporation in the State of Pennsylvania and has its corporate headquarters and principal place of business located at 2211 Leabrook Road, Lancaster, Pennsylvania 17601. (See copy of the Certificate of Organization Domestic Limited Liability Co. for Slaymaker Logistics, LLC, annexed hereto as **Exhibit “B”**).

5. Defendant, ANDREW L. MILLER, resides at 1739 North 7<sup>th</sup> Street, Lebanon, Pennsylvania 17046. (See **Exhibit “A”**).

6. The Complaint alleges that plaintiff WILLIAM CORADO-LEMUS sustained personal injuries resulting from a motor vehicle accident with the defendants on or about August 14, 2018, on the eastbound portion of Route 280 at or near milepost 13.6 in or near Newark, New Jersey. (See **Exhibit “A”**).

7. Upon information and belief, plaintiff, WILLIAM CORADO-LEMUS, sustained damages which exceed \$75,000.00. Based on the foregoing allegations and claims, this action is one in which the amount in controversy exceeds the sum of \$75,000.00, exclusive of interest and costs. Therefore, this action is removable under 28 U.S.C. Section 1441(a), as one over which this Honorable Court has original jurisdiction pursuant to 28 U.S.C. Section 1332(a).

8. This Notice of Removal is filed within thirty (30) days of defendants' receipt of the Complaint, by service or otherwise, and is, therefore, timely filed pursuant to 28 U.S.C. Section 1446(b).

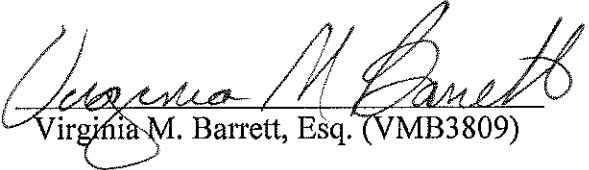
9. Written notice of the filing of this Notice of Removal has been served on plaintiff's counsel and a copy of this Notice has been forwarded for filing with the Office of the Clerk of the Superior Court of the State of New Jersey, County of Hudson, at 595 Newark Avenue, Jersey City, New Jersey, to effect the removal of this action to the United States District Court, pursuant to 28 U.S.C. Section 1446(d).

WHEREFORE, defendants, SLAYMAKER LOGISTICS, LLC and ANDREW L. MILLER, request that the matter be removed from the Superior Court of the State of New Jersey, County of Hudson, to this Honorable Court.

BARRETT LAZAR, LLC  
Attorneys for Defendants,  
SLAYMAKER LOGISTICS, LLC and  
ANDREW L. MILLER

Dated: April 9, 2019

By:

  
Virginia M. Barrett, Esq. (VMB3809)

**AFFIDAVIT OF SERVICE**

STATE OF NEW JERSEY :  
: S.S.  
COUNTY OF BERGEN :

Dana Riccio, being duly sworn, deposes and says that deponent is not a party to the action, is over 18 years of age and resides in New Jersey.

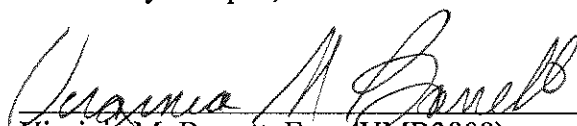
On April 9, 2019, deponent served with the within Notice of Filing and Notice of Removal via e-file on:

Jack V. Corradino  
Corradino & Papa, LLC  
Casey Building  
935 Allwood Road  
Clifton, New Jersey 07012  
**Attorney for Plaintiff**

Hudson County Courthouse  
595 Newark Avenue  
Jersey City, New Jersey 07306

  
DANA RICCIO

Sworn to and subscribed before me  
this 9<sup>th</sup> day of April, 2019

  
Virginia M. Barrett, Esq. (VMB3809)  
Attorney at Law, State of New Jersey

**Exhibit A**

Received:  
Mar. 26. 2019 12:08PM

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No. 0991 P. 6

HUD-L-001024-19 03/12/2019 2:30:40 PM Pg 1 of 44 Trans ID: LCV2019443699

**CORRADINO & PAPA, LLC**

Casey Building  
935 Allwood Road  
Clifton, NJ 07012  
(973) 574-1200

Attorney I.D. No.: 015381995

Attorneys for Plaintiff(s)

**WILLIAM CORADO-LEMUS,**

Plaintiff,

v.

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION: HUDSON COUNTY

DOCKET NO.: HUD-L-

Civil Action

**SLAYMAKER LOGISTICS, LLC,**  
**ANDREW L. MILLER, JOHN DOE I-X**  
(said names being fictitious, true names  
presently unknown), **ABC CORP. I-X** (said  
names being fictitious, true names presently  
unknown), **XYZ EMPLOYER I-X,** (said  
names being fictitious, true names presently  
unknown), **ABC MAINTENANCE CORP. I-X**  
(said names being fictitious, true names  
presently unknown), **DEF BROKERAGE**  
**CORP I-X** (said names being fictitious, true  
names presently unknown),

Defendants,

**COMPLAINT AND JURY DEMAND,  
NOTICE TO TAKE ORAL  
DEPOSITIONS, DEMAND FOR  
ANSWERS TO INTERROGATORIES,  
DEMAND FOR DISCOVERY OF  
INSURANCE INFORMATION,  
DEMAND TO PRODUCE DOCUMENTS,  
REQUEST FOR ADMISSIONS,  
STATEMENT OF DAMAGES**

Plaintiff **WILLIAM CORADO-LEMUS** residing at 622 Warren Street, Apt. #4,  
in the Township of Harrison, New Jersey, by way of Complaint against the Defendant(s)  
hereby states the following:

**FACTUAL BACKGROUND**

1. On and before August 14, 2018, the Defendant, **SLAYMAKER LOGISTICS, LLC,** was a corporation doing business in Pennsylvania as a commercial truck transportation carrier enterprise providing interstate and intrastate transport and shipping with a main office at 2211 Leubrook Road, Lancaster, PA, 17601. Pursuant to Rule 4:3-2(b), the basis for venue in Hudson derives from Defendant, **SLAYMAKER**

**CORRADINO & PAPA, LLC**  
935 Allwood Road, Suite 240  
Clifton, N.J. 07012  
(973) 574-1200



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No. 0991 P. 7

HUD-L-001024-19 03/12/2019 2:30:40 PM Pg 2 of 44 Trans ID: LCV2019443689

LOGISTICS, LLC, actually doing business in Hudson County via it's over the road transportation business, as well as Plaintiff's residence being located in Hudson County,

2. Upon information and belief, at all relevant times stated herein, the Defendant, **ANDREW L. MILLER**, resides at 1739 North 7<sup>th</sup> Street, Lebanon, PA 17046. At all relevant times, herein, the Defendant was an employee, agent, servant and/or independent contractor of the Defendant, **SLAYMAKER LOGISTICS, LLC** acting in the scope of his employment during the underlying motor vehicle/tractor-trailer collision.

#### FIRST COUNT

1. On or about August 14, 2018, the Plaintiff, **WILLIAM CORADO-LEMUS**, was the driver in a motor vehicle bearing New Jersey license plate F41EMN, and travelling Eastbound on Route 280, at or near milepost 13.6 in or near Newark, New Jersey.

2. At the time and place aforesaid, the Defendant, **ANDREW L. MILLER**, or **JOHN DOES I-X** (said names being fictitious, true names presently unknown), was the operator of a certain commercial tractor trailer, owned by Defendant, **SLAYMAKER LOGISTICS, LLC**, and/or **ABC CORP. I-X** (said names being fictitious, true names presently unknown), and bearing Pennsylvania license plate number AG08048, Defendant, **ANDREW L. MILLER**, and/or **JOHN DOES I-X** (said names being fictitious, true names presently unknown), was operating the commercial vehicle with the permission of said owners as agent, servant and/employee in the Eastbound lane on Route 280, at or near milepost 13.6 in or near Newark, New Jersey.

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Clifton, N.J. 07012  
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HUD-L-001024-19 03/12/2019 2:30:40 PM Pg 3 of 44 Trans ID: LCV2019443699

3. Upon information and belief, at all times relevant herein, **ABC CORP I-X**, contracted/employed Defendant, **SLAYMAKER LOGISTICS, LLC**, and/or **ABC CORP. I-X** (said names being fictitious, true names presently unknown), to transport its cargo over interstate and interstate highways and roadways.

4. At the time and place stated herein, the trailer transported by **SLAYMAKER LOGISTICS, LLC**, and/or **ABC CORP. I-X** (said names being fictitious, true names presently unknown) through its agent, servant and employee, Defendants, **ANDREW L. MILLER**, and/or **JOHN DOES I-X** (said names being fictitious, true names presently unknown), was transporting cargo in the course of its duties for Defendant, **ABC CORP I-X**.

5. At the time and place aforesaid, all of the Defendants above named, owed a duty to vehicular traffic and the general public making use of the above-described highway and more particularly to the Plaintiff, **WILLIAM CORADO-LEMUS**, through his agents, servants and employees maintaining and operating said tractor and trailer combination, to operate and control their tractor-trailer in a reasonably safe and careful manner, and further to make observation of other vehicles on the highway and maintain control of the tractor and trailer its instrumentalities and parts, at all times.

6. At the time and place aforesaid the defendants, did breach the requisite duty of due care and applicable statutory sections of the New Jersey Motor Vehicle and Traffic Laws in maintaining and operating the above-described commercial vehicle in such a negligent, careless, grossly negligent and reckless manner, in that he failed to observe, caused and permitted, the commercial tractor and trailer to crash into the vehicle occupied by the Plaintiff, **WILLIAM CORADO-LEMUS** and caused **WILLIAM**

**CORRADINO & PAPA, LLC**  
935 Alhwood Road, Suite 240  
Clifton, N.J. 07012  
(973) 574-1200

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No. 0991 P. 9

HUD-L-001024-19 03/12/2019 2:30:40 PM Pg 4 of 44 Trans ID: LCV2019443699

**CORADO-LEMUS** to sustain and suffer severe and permanent injuries and other damages hereafter alleged, all of which was a foreseeable harm and loss caused by the aforesaid negligence, gross and reckless conduct complained of.

7. Upon information and belief, **DEF BROKERAGE CORP I-X** (said names being fictitious, true names presently unknown), was a transportation broker which arranged for the transportation of the materials being transported at the time and place aforesaid and owed a duty to assure that the tractor and trailer for transport was reasonably safe and the operator reasonably competent for the operation of said vehicle and tanker. Said Defendant broker was negligent in engaging the subject vehicle and rig as well as the negligent and incompetent operator, Defendant, **ANDREW L. MILLER**.

8. As a result of the negligence, gross negligence and reckless conduct of the respective defendants, as hereinabove set forth, the Plaintiff, **WILLIAM CORADO-LEMUS**, was caused to sustain severe and serious injuries to his head, body, neck, back, limbs and nervous system, which further caused him to suffer severe and excruciating pain, as well as, extreme mental anguish. Upon information and belief, said injuries suffered by Plaintiff, **WILLIAM CORADO-LEMUS**, or some of them, and the disabling effects resulting therefrom, are permanent in nature. As a further result of said injuries, the Plaintiff, **WILLIAM CORADO-LEMUS**, was required to expend sums of money for medical care and attention, which were administered to him in an attempt to cure and/or alleviate said injuries and the disabling effects resulting therefrom, and Plaintiff, **WILLIAM CORADO-LEMUS**, in the future will be required to submit to further medical attention. As a further result of said injuries, the Plaintiff has been unable to perform his usual daily tasks and has been prevented from participating in activities

**CORRADINO & PAPA, LLC**  
935 Allwood Road, Suite 240  
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HUD-L-001024-19 03/12/2019 2:30:40 PM Pg 5 of 44 Trans ID: LCV2019443699

enjoyed by others like situated in life, all of which has prevented him from enjoying the normal fruits of his existence, both socially and economically, and the Plaintiff was otherwise damaged.

**WHEREFORE**, the Plaintiff, **WILLIAM CORADO-LEMUS**, demands judgment against the Defendants, **ANDREW L. MILLER, SLAYMAKER LOGISTICS, LLC, JOHN DOES I-X**, (said names being fictitious, true names presently unknown), **ABC CORPORATION I-X** (said names being fictitious, true names presently unknown), and **XYZ EMPLOYER I-X** (said names being fictitious, true names presently unknown), **ABC MAINTENANCE CORPORATION I-X** (said names being fictitious, true names presently unknown), **XYZ BROKERAGE CORPORATION I-X** (said names being fictitious, true names presently unknown), jointly and severally, together with costs, disbursements of suit and interest and such other relief so deemed just by the Court.

#### SECOND COUNT

1. Plaintiff, **WILLIAM CORADO-LEMUS** repeats, reiterates and realleges each and every allegation of the Factual Background and First Count as if the same were more fully set forth herein at length.

2. On or about August 14, 2018, the Defendants, **SLAYMAKER LOGISTICS, LLC, JOHN DOES I-X**, (said names being fictitious, true names presently unknown), **ABC CORPORATION I-X** (said names being fictitious, true names presently unknown), was/were the owners of the aforesaid tractor-trailer that it granted and entrusted the operation to Defendant, **ANDREW L. MILLER** and/or **JOHN DOES I-X**, (said names being fictitious, true names presently unknown).

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Chilton, N.J. 07012  
(973) 374-1200

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No. 0991 P. 11

HUD-L-001024-19 03/12/2019 2:30:40 PM Pg 8 of 44 Trans ID: LCV2019443699

3. Upon information and belief and at all times hereinafter mentioned, and more particularly on or about August 14, 2018, the Defendants, **SLAYMAKER LOGISTICS, LLC**, **JOHN DOES I-X**, (said names being fictitious, true names presently unknown), **ABC CORPORATION I-X** (said names being fictitious, true names presently unknown), and **XYZ EMPLOYER I-X** (said names being fictitious, true names presently unknown), **ABC MAINTENANCE CORPORATION I-X** (said names being fictitious, true names presently unknown), **XYZ BROKERAGE CORPORATION I-X** (said names being fictitious, true names presently unknown), were doing business within the State of New Jersey.

4. Upon information and belief, at the time and place aforesaid, the Defendants, **SLAYMAKER LOGISTICS, LLC**, **JOHN DOES I-X**, (said names being fictitious, true names presently unknown), **ABC CORPORATION I-X** (said names being fictitious, true names presently unknown), and **XYZ EMPLOYER I-X** (said names being fictitious, true names presently unknown), **ABC MAINTENANCE CORPORATION I-X** (said names being fictitious, true names presently unknown), **XYZ BROKERAGE CORPORATION I-X** (said names being fictitious, true names presently unknown), through its agent, servant, permissive user and/or employee, **ANDREW L. MILLER** and/or **JOHN DOES I-X**, (said names being fictitious, true names presently unknown), through the course of employment and/or entrustment with and/or by Defendants, was/were negligent and careless in the operation of Defendants' tractor-trailer rig, in that he so negligently and carelessly maintained and operated the said tractor-trailer that he caused said vehicle to violently, and with great force, crash and strike the motor vehicle occupied by the Plaintiff, **WILLIAM CORADO-LEMUS**,

**CORRADINO & PAPA, LLC**  
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 (973) 574-1200

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No. 0991 P. 12

HUD-L-001024-19 03/12/2019 2:30:40 PM Pg 7 of 44 Trans ID: LCV2019443699

and thereby causing Plaintiff to sustain and suffer the injuries and other damages hereafter alleged and are liable to the Plaintiff for the negligent and reckless acts stated above under the Doctrine of *Respondeat Superior*, Permissive Use and/or Negligent Entrustment.

5. Upon information and belief, Defendant, ABC MAINTENANCE CORPORATION I-X (said names being fictitious, true names presently unknown), through its agents, servants, and/or employees negligently serviced and maintained the tractor and trailer rig here involved thereby contributing to the collision and resulting injuries complained of.

6. As a result of the aforesaid negligence and carelessness of the Defendants, ANDREW L. MILLER, SLAYMAKER LOGISTICS, LLC, JOHN DOES I-X, (said names being fictitious, true names presently unknown), ABC CORPORATION I-X (said names being fictitious, true names presently unknown), and XYZ EMPLOYER I-X (said names being fictitious, true names presently unknown), ABC MAINTENANCE CORPORATION I-X (said names being fictitious, true names presently unknown), XYZ BROKERAGE CORPORATION I-X (said names being fictitious, true names presently unknown), as hereinabove set forth, caused the Plaintiff, WILLIAM CORADO-LEMUS, to sustain and suffer severe and serious injuries to his head, neck, back, body, limbs, and nervous system, which further caused him to suffer severe and excruciating pain, as well as extreme mental anguish. Upon information and belief, said injuries, or some of them, and the disabling effects resulting therefrom, are permanent in nature. As a further result of said injuries, the Plaintiff, WILLIAM CORADO-LEMUS, has incurred expenses for the treatment of said injuries and will in the future be

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(973) 574-1200

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No. 0991 P. 13

HUD-L-001024-19 03/12/2019 2:30:40 PM Pg 8 of 44 Trans ID: LCV2019443689

required to incur additional medical expenses in an attempt to seek cure and/or alleviate said injuries and the disabling effects resulting therefrom. As a further result of said injuries, the Plaintiff has been unable to perform his usual daily tasks and has been prevented from participating in activities enjoyed by others like situated in life, all of which has prevented him from enjoying the normal fruits of his existence, both socially and economically and the Plaintiff was otherwise damaged.

WHEREFORE, the Plaintiff, WILLIAM CORADO-LEMUS, demands judgment against the Defendants, ANDREW L. MILLER, SLAYMAKER LOGISTICS, LLC, JOHN DOES I-X, (said names being fictitious, true names presently unknown), ABC CORPORATION I-X (said names being fictitious, true names presently unknown), and XYZ EMPLOYER I-X (said names being fictitious, true names presently unknown), ABC MAINTENANCE CORPORATION I-X (said names being fictitious, true names presently unknown), XYZ BROKERAGE CORPORATION I-X (said names being fictitious, true names presently unknown), jointly and severally, together with costs, disbursements of suit and interest and any other relief the Court deems just.

### THIRD COUNT

1. Plaintiff, WILLIAM CORADO-LEMUS, repeats, reiterates and re-alleges each and every allegation of the Factual Background, First and Second Counts as if the same were more fully set forth herein at length.

2. On or about October 25, 2016, the Defendants, SLAYMAKER LOGISTICS, LLC, JOHN DOES I-X, (said names being fictitious, true names presently unknown), ABC CORPORATION I-X (said names being fictitious, true

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935 Allwood Road, Suite 240  
Clifton, N.J. 07012  
(973) 576-1260



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No. 0991 P. 14

HUD-L-001024-19 03/12/2019 2:30:40 PM Pg 9 of 44 Trans ID: LCV2019443699

names presently unknown), and XYZ EMPLOYER I-X (said names being fictitious, true names presently unknown), ABC MAINTENANCE CORPORATION I-X (said names being fictitious, true names presently unknown), XYZ BROKERAGE CORPORATION I-X (said names being fictitious, true names presently unknown), was/were the owners of the aforesaid motor vehicle, controlled, operated, serviced and/or maintained it, and which they granted and entrusted the operation of, to Defendant, ANDREW L. MILLER and/or JOHN DOES I-X, (said names being fictitious, true names presently unknown).

3. At said time and place, the Defendants, SLAYMAKER LOGISTICS, LLC, JOHN DOES I-X, (said names being fictitious, true names presently unknown), ABC CORPORATION I-X (said names being fictitious, true names presently unknown), and XYZ EMPLOYER I-X (said names being fictitious, true names presently unknown), ABC MAINTENANCE CORPORATION I-X (said names being fictitious, true names presently unknown), XYZ BROKERAGE CORPORATION I-X (said names being fictitious, true names presently unknown), knew or should have known that Defendant, ANDREW L. MILLER and/or JOHN DOES I-X, (said names being fictitious, true names presently unknown), had in the past negligently and carelessly operated the above referenced tractor-tanker rig and/or other commercial or personal motor vehicles.

4. On or about August 15, 2018, the Defendant, ANDREW L. MILLER and/or JOHN DOES I-X, (said names being fictitious, true names presently unknown), operated the above described tractor-tanker combination in such a careless, reckless, grossly negligent and/or negligent manner that he crashed into the vehicle occupied by

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935 Alford Road, Suite 240  
Clifton, NJ, 07012  
(973) 374-1200



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No. 0991 P. 15

HUD-L-001024-19 03/12/2019 2:30:40 PM Pg 10 of 44 Trans ID: LCV2019443699

Plaintiff, **WILLIAM CORADO-LEMUS**, which caused the Plaintiff to sustain injuries and other damages hereinafter alleged.

5. Upon information and belief and at all times hereinafter mentioned, the Defendants, or any or all of them, acted with the negligence, carelessness, gross negligence and/or recklessness regarding the safety of the general public at large, and the Plaintiff, **WILLIAM CORADO-LEMUS**, more particularly, in enabling, permitting and/or entrusting the Defendant, **ANDREW L. MILLER**, to obtain the use of the commercial vehicle and tanker, an inherently dangerous instrumentality, without investigating the Defendant, **ANDREW L. MILLER'S**, driving records and/or history.

6. As a direct and proximate result of the negligence, carelessness and reckless disregard of the Defendants, **SLAYMAKER LOGISTICS, LLC**, **JOHN DOES I-X**, (said names being fictitious, true names presently unknown), **ABC CORPORATION I-X** (said names being fictitious, true names presently unknown), and **XYZ EMPLOYER I-X** (said names being fictitious, true names presently unknown), **ABC MAINTENANCE CORPORATION I-X** (said names being fictitious, true names presently unknown), **XYZ BROKERAGE CORPORATION I-X** (said names being fictitious, true names presently unknown), in permitting, entrusting and/or enabling the Defendant, **ANDREW L. MILLER**, to possess and operate said commercial vehicle in a negligent manner as described above, the Plaintiff, **WILLIAM CORADO-LEMUS**, was caused to sustain and suffer severe and serious injuries to his head, neck, back, body, limbs, and nervous system, which further caused him to suffer severe and excruciating pain, as well as extreme mental anguish. Upon information and belief, said injuries, or some of them, and the disabling effects resulting therefrom, are permanent in nature. As

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No. 0991 P. 16

HUD-L-001024-19 03/12/2019 2:30:40 PM Pg 11 of 44 Trans ID: LCV2019443699

a further result of said injuries, the Plaintiff has incurred expenses for the treatment of said injuries and will in the future be required to incur additional medical expenses in an attempt to seek cure and/or alleviate said injuries and the disabling effects resulting therefrom. The Plaintiff, **WILLIAM CORADO-LEMUS**, has been unable to perform his usual daily tasks and has been prevented from participating in activities enjoyed by others like situated in life, all of which has prevented him from enjoying the normal fruits of his existence, both socially and economically and the Plaintiff was otherwise damaged.

**WHEREFORE**, the Plaintiff, **WILLIAM CORADO-LEMUS**, demands judgment against the Defendants, **ANDREW L. MILLER, SLAYMAKER LOGISTICS, LLC, JOHN DOES I-X**, (said names being fictitious, true names presently unknown), **ABC CORPORATION I-X** (said names being fictitious, true names presently unknown), and **XYZ EMPLOYER I-X** (said names being fictitious, true names presently unknown), **ABC MAINTENANCE CORPORATION I-X** (said names being fictitious, true names presently unknown), **XYZ BROKERAGE CORPORATION I-X** (said names being fictitious, true names presently unknown), jointly and severally, together with costs, disbursements of suit and interest and other such relief the Court shall deem just.

#### FOURTH COUNT

1. Plaintiff, **WILLIAM CORADO-LEMUS**, repents, reiterates and re-alleges each and every allegation of the Factual Background, First, Second and Third Counts as if the same were more fully set forth herein at length.

2. The Defendants, **ANDREW L. MILLER, SLAYMAKER LOGISTICS, LLC, JOHN DOES I-X**, (said names being fictitious, true names presently unknown),

**CORRADINO & PAPA, LLC**  
935 Allwood Road, Suite 240  
Clifton, N.J. 07012  
(973) 574-1200

Received:  
Mar. 26, 2019 12:10PM

Mar 26 2019 01:18pm

No. 0991 P. 17

HUD-L-001024-19 03/12/2019 2:30:40 PM Pg 12 of 44 Trans ID: LCV2019443699

ABC CORPORATION I-X (said names being fictitious, true names presently unknown), and XYZ EMPLOYER I-X (said names being fictitious, true names presently unknown), ABC MAINTENANCE CORPORATION I-X (said names being fictitious, true names presently unknown), XYZ BROKERAGE CORPORATION I-X (said names being fictitious, true names presently unknown), any or all of them, maintained the subject commercial vehicle, a 2001 Peterbilt TT bearing VIN 1XP5DB7XX10562034 (hereinafter "2001 Peterbilt") and its component parts, in such a careless and reckless manner so as to cause a violent and crash as ANDREW L. MILLER operated it on Route 280, Eastbound.

3. Due to the negligent, careless, and reckless maintenance of the commercial vehicle, a 2001 Peterbilt, and its component parts by the Defendants, ANDREW L. MILLER, SLAYMAKER LOGISTICS, LLC, JOHN DOES I-X, (said names being fictitious, true names presently unknown), ABC CORPORATION I-X (said names being fictitious, true names presently unknown), and XYZ EMPLOYER I-X (said names being fictitious, true names presently unknown), ABC MAINTENANCE CORPORATION I-X (said names being fictitious, true names presently unknown), XYZ BROKERAGE CORPORATION I-X (said names being fictitious, true names presently unknown), the Plaintiff, WILLIAM CORADO-LEMUS, has been caused to suffer permanent injuries and other damages as herein set forth.

WHEREFORE, the Plaintiff, WILLIAM CORADO-LEMUS, demands judgment against the Defendants, ANDREW L. MILLER, SLAYMAKER LOGISTICS, LLC, JOHN DOES I-X, (said names being fictitious, true names presently unknown), ABC CORPORATION I-X (said names being fictitious, true

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Clifton, N.J. 07012  
(973) 574-1200

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No. 0991 P. 18

HUD-L-001024-19 03/12/2019 2:30:40 PM Pg 13 of 44 Trans ID: LCV2019443699

names presently unknown), and XYZ EMPLOYER I-X (said names being fictitious, true names presently unknown), ABC MAINTENANCE CORPORATION I-X (said names being fictitious, true names presently unknown), XYZ BROKERAGE CORPORATION I-X (said names being fictitious, true names presently unknown), jointly and severally, together with costs, disbursements of suit and interest and other such relief the Court shall deem just.

#### FIFTH COUNT

1. Plaintiff, WILLIAM CORADO-LEMUS, repeats, reiterates and re-alleges each and every allegation of the Factual Background, First, Second, Third and Fourth Counts as if the same were more fully set forth herein at length.

2. The Defendants, ANDREW L. MILLER, SLAYMAKER LOGISTICS, LLC, JOHN DOES I-X, (said names being fictitious, true names presently unknown), ABC CORPORATION I-X (said names being fictitious, true names presently unknown), and XYZ EMPLOYER I-X (said names being fictitious, true names presently unknown), ABC MAINTENANCE CORPORATION I-X (said names being fictitious, true names presently unknown), XYZ BROKERAGE CORPORATION I-X (said names being fictitious, true names presently unknown), any or all of them, hired, retained, contracted and/or authorized the respective Defendants, ANDREW L. MILLER, SLAYMAKER LOGISTICS, LLC, JOHN DOES I-X, (said names being fictitious, true names presently unknown), ABC CORPORATION I-X (said names being fictitious, true names presently unknown), and XYZ EMPLOYER I-X (said names being fictitious, true names presently unknown), ABC MAINTENANCE CORPORATION I-X (said names being fictitious, true names presently unknown),

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(973) 374-1200

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No. 0991 P. 19

HUD-L-001024-19 03/12/2019 2:30:40 PM Pg 14 of 44 Trans ID: LCV2019443699

XYZ BROKERAGE CORPORATION I-X (said names being fictitious, true names presently unknown) to inspect, maintain, repair, manage, supervise and/or operate the subject commercial vehicle, a 2001 Peterbilt and its component parts, to assure same could operate safely and in good working order on the public roadways.

3. Due to the negligent, careless, and reckless maintenance, inspection, repair, management and/or supervision of the 2001 Peterbilt, and its component parts by the Defendants, ANDREW L. MILLER, SLAYMAKER LOGISTICS, LLC, JOHN DOES I-X, (said names being fictitious, true names presently unknown), ABC CORPORATION I-X (said names being fictitious, true names presently unknown), and XYZ EMPLOYER I-X (said names being fictitious, true names presently unknown), ABC MAINTENANCE CORPORATION I-X (said names being fictitious, true names presently unknown), XYZ BROKERAGE CORPORATION I-X (said names being fictitious, true names presently unknown), the Plaintiff, WILLIAM CORADO-LEMUS, has been caused to suffer permanent injuries and other damages as herein set forth.

WHEREFORE, the Plaintiff, WILLIAM CORADO-LEMUS, demands judgment against the Defendants, ANDREW L. MILLER, SLAYMAKER LOGISTICS, LLC, JOHN DOES I-X, (said names being fictitious, true names presently unknown), ABC CORPORATION I-X (said names being fictitious, true names presently unknown), and XYZ EMPLOYER I-X (said names being fictitious, true names presently unknown), ABC MAINTENANCE CORPORATION I-X (said names being fictitious, true names presently unknown), XYZ BROKERAGE CORPORATION I-X (said names being fictitious, true names presently unknown),

CORRADINO & PAPA, LLC  
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Chilton, N.J. 07012  
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HUD-L-001024-19 03/12/2019 2:30:40 PM Pg 15 of 44 Trans ID: LCV2019443699

jointly and severally, together with costs, disbursements of suit and interest and other such relief the Court shall deem just.

WHEREFORE, Plaintiff demands judgment against the Defendants as aforesaid, either jointly, severally or in the alternative, for damages together with interest and costs of suit.



JACK V. CORRADINO

Date: March 5, 2019

JURY DEMAND

Plaintiffs demand trial by jury on all issues.

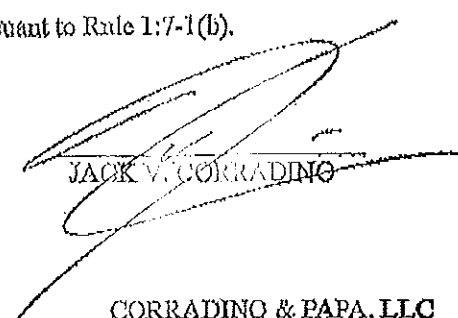


JACK V. CORRADINO

Date: March 5, 2019

TIME UNIT RULE

Plaintiff(s) intends on using the Time Unit pursuant to Rule 1:7-1(b).



JACK V. CORRADINO

Date: March 5, 2019

CORRADINO & PAPA, LLC  
935 Allwood Road, Suite 240  
Chilton, N.J. 07012  
(973) 574-1200

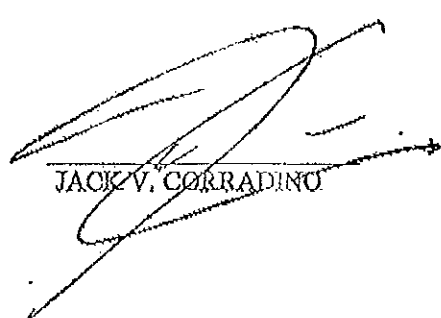
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**DESIGNATION OF TRIAL COUNSEL**

In accordance with R. 4:25-4, ROBERT C. PAPA, JR., Esq. is hereby designated as trial counsel as to all issues and matters affecting this litigation on behalf of the Plaintiff, **WILLIAM CORADO-LEMUS**.

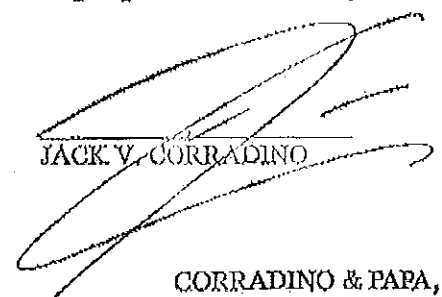
  
JACK V. CORRADINO

Date: March 5, 2019

**CERTIFICATION PURSUANT TO R. 4:5-1**

I, JACK V. CORRADINO hereby certify as follows:

1. I am an attorney at law of the State of New Jersey and am a member of the firm and as such, I am fully familiar with same.
2. To the best of my knowledge, confirmation and belief, there is no other action pending about the subject matter of this Complaint in the Superior Court of New Jersey, Law Division, HUDSON COUNTY. Additionally, there are no other persons known to me who should be added as parties to this matter, nor are there any other actions contemplated.
3. I do hereby certify that the foregoing statements made by me are true to the best of my knowledge. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

  
JACK V. CORRADINO

Date: March 5, 2019

**CORRADINO & PAPA, LLC**  
935 Alwood Road, Suite 240  
Chilton, N.J. 07012  
(973) 574-1200

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Mar. 26. 2019 12:11PM

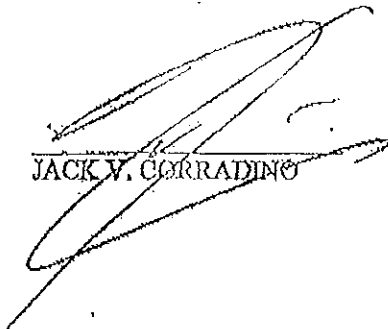
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No. 0991 P. 22

HUD-L-001024-18 03/12/2019 2:30:40 PM Pg 17 of 44 Trans ID: LCV2019443609

**DEMAND FOR INTERROGATORY ANSWERS**

Demand is hereby made upon Defendants to provide answers to the applicable Uniform Personal Injury Interrogatories Form C and C (1) within the time prescribed by the Rules of Court.

  
JACK V. CORRADINO

Date: March 3, 2019

CORRADINO & PAPA, LLC  
935 Allwood Road, Suite 240  
Clifton, NJ 07012  
(973) 574-1200



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No. 0991 P. 2

**CORRADINO & PAPA, LLC**Casey Building  
935 Allwood Road, Suite 240  
Clifton, New Jersey 07012  
(973) 574-1200  
Attorney for Plaintiff (s)WILLIAM CORADO-LEMUS,

Plaintiff,

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION: HUDSON COUNTY  
DOCKET NO.: HUD-L-001024-19

v.

CIVIL ACTION

## SUMMONS

SLAYMAKER LOGISTICS, LLC, ANDREW  
L. MILLER, JOHN DOE I-X (said names  
being fictitious, true names presently unknown),  
ABC CORP. I-X (said names being fictitious,  
true names presently unknown), XYZ  
EMPLOYER I-X, (said names being fictitious,  
true names presently unknown), ABC  
MAINTENANCE CORP. I-X (said names being  
fictitious, true names presently unknown), DEF  
BROKERAGE CORP I-X (said names being  
fictitious, true names presently unknown),Defendant (s).

From The State of New Jersey, To The Defendant Named Above:

**SLAYMAKER LOGISTICS, LLC**

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The Complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. (The address of each deputy clerk of the Superior Court is provided.) A \$135.00 filing fee payable to the Clerk of the Superior Court and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee and completed Case Information Statement) if you want the court to hear your defense.

If you do not file and serve a written answer or motion within 35 days, the court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A list of these numbers is also provided.

Michelle Smith

Clerk of the Superior Court

Dated: March 26, 2019

Name of Defendant to be Served:

Address of the Defendant to be Served:

Slaymaker Logistic, LLC  
2211 Leashbrook Road  
Lancaster, PA 17601

**Exhibit B**

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF STATE  
CORPORATION BUREAU  
401 NORTH STREET, ROOM 206  
P.O. BOX 8722  
HARRISBURG, PA 17105-8722  
WWW.CORPORATIONS.STATE.PA.US/CORP

SLAYMAKER LOGISTICS, LLC

THE CORPORATION BUREAU IS HAPPY TO SEND YOU YOUR FILED DOCUMENT. THE CORPORATION BUREAU IS HERE TO SERVE YOU AND WANTS TO THANK YOU FOR DOING BUSINESS IN PENNSYLVANIA.

IF YOU HAVE ANY QUESTIONS PERTAINING TO THE CORPORATION BUREAU, PLEASE VISIT OUR WEB SITE LOCATED AT WWW.CORPORATIONS.STATE.PA.US/CORP OR PLEASE CALL OUR MAIN INFORMATION TELEPHONE NUMBER (717)787-1057. FOR ADDITIONAL INFORMATION REGARDING BUSINESS AND / OR UCC FILINGS, PLEASE VISIT OUR ONLINE "SEARCHABLE DATABASE" LOCATED ON OUR WEB SITE.

ENTITY NUMBER: 4088233

Slaymaker, Joel  
2211 Leabrook Road  
Lancaster, PA 17601

Entity #: 4088233  
 Date Filed: 02/21/2012  
 Carol Alchele  
 Secretary of the Commonwealth

**PENNSYLVANIA DEPARTMENT OF STATE  
 CORPORATION BUREAU**

**Certificate of Organization  
 Domestic Limited Liability Company**  
 (15 Pa.C.S. § 8913)

|                                      |                    |                          |
|--------------------------------------|--------------------|--------------------------|
| Name<br><b>JOEL M. SLAYMAKER</b>     |                    |                          |
| Address<br><b>2211 LEABROOK ROAD</b> |                    |                          |
| City<br><b>LANCASTER, PA</b>         | State<br><b>PA</b> | Zip Code<br><b>17601</b> |

Document will be returned to the  
 name and address you enter to  
 the left.

←

Commonwealth of Pennsylvania  
 CERTIFICATE OF ORGANIZATION 3 Page(s)

Fee: \$125



In compliance with the requirements of 15 Pa.C.S. § 8913 (relating to certificate of organization), the undersigned desiring to organize a limited liability company, hereby certifies that:

1. The name of the limited liability company (designator is required, i.e., "company", "limited" or "limited liability company" or abbreviation):  
**SLAYMAKER LOGISTICS, LLC**

2. The (a) address of the limited liability company's initial registered office in this Commonwealth or (b) name of its commercial registered office provider and the county of venue is:

| (a) Number and Street     | City             | State     | Zip          | County           |
|---------------------------|------------------|-----------|--------------|------------------|
| <b>2211 LEABROOK ROAD</b> | <b>LANCASTER</b> | <b>PA</b> | <b>17601</b> | <b>LANCASTER</b> |

| (b) Name of Commercial Registered Office Provider | County |
|---|--------|
| c/o:  |        |

3. The name and address, including street and number, if any, of each organizer is (all organizers must sign on page 2):

| Name                     | Address  |
|--------------------------|--|
| <b>JOEL M. SLAYMAKER</b> | <b>2211 LEABROOK ROAD, LANCASTER, PA 17601</b> |

PA DEPT. OF STATE

FEB 21 2012

DSCB:15-8913-2

4. *Strike out if inapplicable term*

A member's interest in the company is to be evidenced by a certificate of membership interest.

5. *Strike out if inapplicable:*

Management of the company is vested in a manager or managers.

6. The specified effective date, if any is: 01/01/2012

month date year hour, if any

7. *Strike out if inapplicable:* The company is a restricted professional company organized to render the following restricted professional service(s):

XX

8. For additional provisions of the certificate, if any, attach an 8½ x 11 sheet.

IN TESTIMONY WHEREOF, the organizer(s) has (have)  
signed this Certificate of Organization this

15 day of FEB, 2012.

X Joel M. Raymundo  
Signature

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Signature